

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

NOVARTIS PHARMACEUTICALS)	
CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	
)	
ACTAVIS LLC; APOTEX, INC.;)	Civil Action No. 13-1028 (SDW) (MCA)
APOTEX, CORP.; GLAND PHARMA)	
LTD.; DR. REDDY'S LABORATORIES,)	
INC.; DR. REDDY'S LABORATORIES)	
LTD.; EMCURE PHARMACEUTICALS)	
USA, INC.; EMCURE)	
PHARMACEUTICALS, LTD; HOSPIRA,)	
INC.; PHARMACEUTICS)	
INTERNATIONAL INC.; SAGENT)	
PHARMACEUTICALS, INC.; ACS)	
DOBFAR INFO S.A.; STRIDES, INC.;)	
AGILA SPECIALTIES PRIVATE LTD.;)	
SUN PHARMA GLOBAL FZE;)	
CARACO PHARMACEUTICAL)	
LABORATORIES, LTD; SUN)	
PHARMACEUTICAL INDUSTRIES)	
LTD.; WOCKHARDT USA LLC; and)	
WOCKHARDT LTD.)	
)	
Defendants.)	
)	

**DECLARATION OF RACHEL L. WEINER
IN SUPPORT OF NOVARTIS'S MOTION TO SEAL**

I, Rachel L. Weiner, declare as follows:

1. I am a Senior Associate at Wilmer, Cutler, Pickering, Hale and Dorr, 1875 Pennsylvania Avenue NW, Washington, DC 20006, and counsel for Plaintiff Novartis Pharmaceuticals Corporation ("Novartis") in the above-captioned matter. I submit this certification in support of Novartis's Motion to Seal.

2. Novartis is requesting entry of an Order, pursuant to Local Civil Rule 5.3(c), to seal the following documents [D.I. 232]:

- 1) Portions of Novartis's Opposition to Wockhardt's Motion to Dismiss Count II of the Corrected Amended Complaint; and
- 2) Exhibits 1 and 2 to the Declaration of Robert W. Trenchard in Support of Novartis's Opposition to Wockhardt's Motion to Dismiss Count II of the Corrected Amended Complaint.

(collectively, the "Subject Material").

3. The aforementioned documents include information relating to Defendants Wockhardt USA LLC and Wockhardt Ltd. ("Defendants") ANDA product and/or proprietary business information that Defendants have designated as confidential and/or nonpublic. By making such a designation, Defendants have manifested their belief that the public disclosure of this information could adversely affect their legitimate business interests. Without conceding that the information found in the Subject Material warrants such a designation, Plaintiff attempts to honor this designation by filing the Subject Material under seal pursuant to Local Rule 5.3.

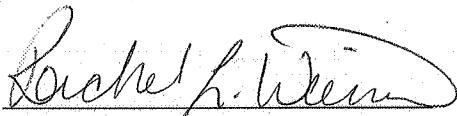
4. If this submission is not sealed, it is my understanding defendants would suffer harm.

5. There is no less restrictive alternative other than the sealing of this information.

This is the least restrictive alternative available to protect information that is confidential and/or pursuant to Fed. R. Civ. P. 26(c).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 14, 2013


Rachel L. Weiner